

Attorney for Defendant  
Christopher King

**UNITED STATES DISTRICT COURT**

**IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA**

United States of America,

Plaintiff,

VS.

Christopher King,

Defendant

Case No. 2:24-cr-00120-DC

## STIPULATION AND PROPOSED ORDER TO AMEND THE SPECIAL CONDITIONS OF RELEASE

## STIPULATION TO AMEND THE SPECIAL CONDITIONS OF RELEASE

Defendant Christopher King, by and through counsel, respectfully moves this Court, pursuant to 18 U.S.C. §3142(c)(3), to amend the special conditions of release previously set on May 24, 2025. (Document 15) per the stipulation of the parties. In support of this motion, the defendant states as follows:

1           1.       The defendant's third party custodian (Carolina Miller) (document 17) was  
2 arrested early Tuesday morning, September 2, 2025 in Tehama County for Felony Domestic  
3 Violence and Mr. King was the victim. She is currently incarcerated in the Tehama County Jail  
4 with a bail of \$50,000.00 with arraignment to be on September 4th or 5th .

5           2.       Mr. King and Ms. Miller had lived together in a rented duplex in Red Bluff,  
6 California with both of them on the lease as lessees. Based on the nature of the charges pending  
7 against Ms. Miller and her demonstrated attitude against Mr. King, Pretrial Services Officer  
8 Renee Basurto does not want them to continue to live together.

9           3.       Mr. King has exclusively paid the rent and is financially able to continue to do so.  
10 By continuing to live in the same location as he did with Ms. Miller, Mr. King will be able to  
11 maintain the good job he has held since being released from custody and continue the ordered  
12 therapy sessions.

13           4.       Pretrial Services has directed Mr. King to obtain a restraining order against Ms.  
14 Miller prohibiting personal contact between them. (A copy of the Restraining Order he just  
15 obtained is attached hereto as Exhibit "A" and incorporated by reference herein.)

16           5.       Counsel for Mr. King will contact Ms. Miller's attorney after her arraignment to  
17 attempt to determine if she is willing to vacate the duplex in which she lived with Mr. King and  
18 to abide by the restraining order.

19           6.       Mr. King will need a new third party custodian. The defendant's cousin, David  
20 Kaeding, is willing to act as his third party custodian, Ms. Basurto has spoken to and run a  
21 criminal record on Mr. Kaeding and he has no known criminal history and seems appropriate to  
22 her to be the third party custodian. Although Mr. Kaeding lives in Redding with Mr. King in Red  
23 Bluff, Mr. Kaeding has agreed to see Mr. King face to face at least weekly to help insure he is  
24 abiding by his conditions of release which arrangement is acceptable to Ms. Basurto.  
25

1           7.       Based on the changed circumstances, Pretrial Services wishes to have the  
2 discretion to change the location monitoring technology.

3           **IT IS HEREBY STIPULATED** by through their respective counsel, Assistant United  
4 States Attorney Heiko Coppola, counsel for plaintiff, and Jan David Karowsky, counsel for  
5 defendant Christopher King, that the requested special conditions of release for Christopher King  
6 be amended as requested and detailed herein.

7           **THEREFORE**, it is requested the following special conditions of release be amended as  
8 follows:

9           **CONDITIONS:**

10           2. Regarding condition number two, Carolina Miller is removed as the third party  
11 custodian. Condition number two shall read as follows: “David Kaeding shall be the third party  
12 custodian. Mr. King shall be allowed to continue to live by himself at the residence he has  
13 maintained in Red Bluff with Mr. Kaeding continuing to live in Redding, California. Mr.  
14 Kaeding shall meet with Mr. King at least one time a week, face to face, to help insure he is  
15 abiding by his conditions of release. Additionally, Mr. King must not have any face to face  
16 contact with Carolina Miller unless otherwise authorized by a Pretrial Services Officer.”

17           19. Regarding condition number nineteen, the location monitoring technology shall be at  
18 Pretrial Services’ discretion.

19           Furthermore, all special conditions of release, not otherwise amended by this stipulation  
20 and Order, previously imposed on May 24, 2024, shall remain in full force and effect. Attached  
21 hereto as Exhibit “B” and incorporated herein by reference are the “Amended Conditions of  
22 Release,” prepared by Pretrial Services, which incorporate the requested conditions to be  
23 amended.

24       ///

25       ///

WHEREFORE, for the preceding reasons, and any others which may appear just and proper to the Court, it is respectfully requested that the defendant's motion be granted, and Christopher King's special conditions of release be amended as requested.

**IT IS SO STIPULATED.**

JAN DAVID KAROWSKY  
Attorney at Law  
A Professional Corporation

/s/ Jan David Karowsky

by  
JAN DAVID KAROWSKY  
Attorney for Defendant  
Christopher King

ERIC GRANT  
United States Attorney

/s/ HEIKO COPPOLA

by  
HEIKO COPPOLA  
Assistant United States Attorney

I, Christopher King, have read agree to abide by each and every amended condition of my release attached hereto as Exhibit "B" in addition to all of the conditions previously imposed on May 24, 2024.

Dated: 9/5/2025

/s/ Christopher King  
Christopher King

Christopher King, Defendant herein, is placed in the custody of David Kaeding who agrees to supervise the defendant as to any restrictions on travel, association or place of abode and to use every effort to assure the appearance of the defendant at all scheduled hearings before any court of this District and to notify the court immediately in the event the defendant violates

1 any condition of release or disappears. Mr. Keating also has reviewed the attached Exhibit “B,”  
2 the “Amended Conditions of Release” and agrees to notify the court if the defendant violates any  
3 of them.

4 Dated: 9/5/2025

/s/ David Kaeding  
David Kaeding

6  
7 **ORDER**

8 **GOOD CAUSE APPEARING**, it is hereby ordered that the special conditions of release  
9 as detailed above shall be amended as requested. The “Amended Conditions of Release,”  
10 attached hereto as Exhibit “B,” shall be hereafter the conditions of release imposed on Mr. King.

11 **IT IS SO ORDERED.**

12 Dated: September 5, 2025

  
CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE